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July 19, 2017

VIA ECF

Honorable Cheryl L. Pollack
United States Magistrate Judge
United States District Court
for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Rosie Martinez v. City of New York, et al.
15-CV-7105 (PKC) (JO)

Your Honor:

I am the Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department, assigned to represent defendants in the above-referenced matter. Defendants write the court to request an extension of time from which to respond to the Court's Order dated July 11, 2017 requiring the disclosure of the name of an individual whose record was sealed pursuant to NY CLP 160.50 from July 17, 2017 to and including July 28, 2017.

The Court's Order dated July 11, 2017 requested the production of the name, last known address, social security information and other personal data of the individual by July 17, 2017. Defendants were unable to get all the required information by July 17, 2017 and the undersigned is currently on vacation with his family. Defendants therefore request additional time to produce the information to July 28, 2017. Defendants apologize for the untimely request. Plaintiff's counsel objects to defendant's application.

Defendants requested plaintiff consent to the late production of the name but instead stated the following: "Plaintiff objects to defendants' belated application which is only being made because plaintiff notified defendants of her intention to bring their violation to the Court's attention today. Plaintiff respectfully notes that the information at issue is necessary for plaintiff

to locate a key witness, and plaintiff thus been prejudiced by the delay. Plaintiff respectfully submits that defendants' repeated defiance of this Court's orders should not be countenanced."

For the above stated reasons, defendants therefore ask the Court to extend the time for which to answer the Court's July 11, 2017 order from July 17, 2017 to and including July 28, 2017.

Thank you for your consideration herein.

Respectfully submitted,

/s/

Paul H. Johnson
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Baree Fett (**via ECF**)
Harvis and Fett
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